UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

SLATER BRENNAN, Individually and On Behalf of All Others Similarly Situated,

Case No. 1:22-cv-07473

Plaintiff,

v.

LATCH, INC. f/k/a TS INNOVATION ACQUISITIONS CORP., LUKE SCHOENFELDER, GARTH MITCHELL, and BARRY SCHAEFFER.

Defendants.

NOTICE OF MOTION OF KENNETH GRUTMAN TO APPOINT LEAD PLAINTIFF AND APPROVE PROPOSED LEAD PLAINTIFF'S CHOICE OF COUNSEL

PLEASE TAKE NOTICE that class member Kenneth Grutman ("Movant") hereby moves this Court, pursuant to the Private Securities Litigation Reform Act of 1995, 15 U.S.C. §78u-4(a)(3)(B), at the United States District Court for the Southern District of New York, before the Honorable John G. Koeltl, located at 500 Pearl Street, New York, New York 10007, for an Order: (a) appointing Movant to serve as the Lead Plaintiff; and (b) approving Movant's choice of counsel. In support of this motion, Movant submits: (a) a Memorandum in Support; (b) the Declaration of William B. Federman; and (c) a (Proposed) Order granting Movant's Motion. As set forth in the Memorandum in Support filed concurrently herewith, the procedural requirements of the PSLRA have been satisfied and Movant Grutman is the presumptive most adequate plaintiff and further satisfies the typicality and adequacy requirements of Fed. R. Civ. P. 23. As such, Movant respectfully requests this Court appoint Movant Kenneth Grutman as the Lead Plaintiff in this action and approve his selection of Federman & Sherwood as Lead Counsel for the Lead Plaintiff and the proposed class.

Date: October 31, 2022 Respectfully submitted,

/s/ William B. Federman

William B. Federman (WF9124) **FEDERMAN & SHERWOOD**

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Counsel for Movant Kenneth Grutman

CERTIFICATE OF SERVICE

This is to certify that on October 31, 2022, I electronically transmitted this document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the counsel of record.

/s/ William B. Federman

William B. Federman